

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Kristin Terez Campbell

Case: 2:24-mj-30382

Assigned To : Unassigned

Assign. Date : 9/5/2024

Case No.

Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 2018 through April 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 922(a)(6)

18 U.S.C. § 922(a)(1)(A)

False Statement during the purchase of a firearm

Engaging in the manufacturing and distribution of firearms without a license

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*

Christopher Loperfido, Special Agent (ATF)

*Printed name and title*Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: September 5, 2024City and state: Detroit, Michigan*Judge's signature*

Hon. David R. Grand, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT
AND ARREST WARRANT**

I, Special Agent Christopher E. Loperfido, being duly sworn, do hereby state the following:

INTRODUCTION

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since December of 2018. I am currently assigned to the ATF Detroit Field Division. I have received extensive training on firearms identification and common scenarios involving firearms trafficking.

2. During my employment with ATF, I have assisted with investigating criminal violations relating to firearms, violent crime, and controlled substances. I have participated in many aspects of criminal investigations, including, but not limited to, interviews, physical surveillance, and the execution of search warrants.

3. The statements contained in this affidavit are based on conversations with other law enforcement officers, a review of relevant police reports, and my involvement in this investigation. This affidavit summarizes such information but does not provide every detail known to law enforcement regarding this investigation and provides only

information necessary to establish probable cause that Kristin Terez Campbell violated 18 U.S.C. § 922(a)(6) (False Statement During Purchase of a Firearm) and 18 U.S.C. § 922(a)(1)(A) (Engaging in Manufacturing and Distribution of Firearms Without a License).

PROBABLE CAUSE

4. According to ATF Analytics, the Bureau's consolidated service for analyzing data about firearms, between February 2018 and April 2024, Kristin Campbell purchased at least 93 firearms from Federal Firearm Licensees (FFLs). In 2022 and 2023 alone, he purchased at least 65 firearms.

5. For each of these known purchases, Campbell filled out a "Firearms Transaction Record," or ATF Form 4473, stating that he was the "actual buyer" of the firearm and that he did not "intend to sell or otherwise dispose of any firearm listed on this form . . . in furtherance of any felony." Purchasing a weapon for someone else is commonly called a "straw purchase," and violates 18 U.S.C. § 922(a)(6), which prohibits making a false statement during the purchase of a firearm.

6. Another section of the ATF Form 4473, located directly above the purchaser signature line, informed Campbell of specific federal

violations that pertain to firearm purchases. For each purchase, Campbell signed the form 4473 declaring that he understood that “the repetitive purchase of firearms for the purpose of resale for livelihood and profit without a federal firearms license is a violation of Federal law.” The instructions state that 18 U.S.C. § 922(a)(1)(A) makes it unlawful for a person to deal in firearms without a license.

7. Campbell does not currently possess a Federal Firearms License.

8. In April 2024, law enforcement searched Campbell’s house, pursuant to a federal warrant, and located only 16 firearms—despite having records that Campbell had purchased at least 90 firearms since 2020. Nine of the 16 firearms found at Campbell’s house had been purchased within the three months prior to the search.

9. During the search of Campbell’s house, law enforcement also found firearm parts, accessories, and manufacturing equipment. During an interview, Campbell admitted to building and selling firearms. Law enforcement also seized Campbell’s electronic devices.

10. In June 2024, law enforcement conducted a review of Campbell’s cellular phone, which was seized during the search warrant.

The review of Campbell's phone revealed many photographs and videos of firearms and firearm accessories displayed for sale as well as screen shots of firearms he offered to purchase for unknown individuals. In text messages, Campbell and unknown individuals discussed the buying and selling of firearms as well as buying firearms on behalf of other people.

11. For example, on July 16, 2022, Campbell sent a text message with a photograph of a firearm, stating: "That one is a grand 550 without the grenade launcher. Comes with a 60rd mag loaded/Pass the word no paperwork on either one." On August 24, 2023, Campbell sent a text message stating: "It's another weekend sale 2 for 675 the glocks with 3 down and the 375 in a couple of days a week at the most."

12. In addition to purchasing firearms, records from FFLs show that Campbell purchased 60 receivers and frames, many of the same make and model, and largely inexpensive. Based on my training and experience, purchasing multiple, inexpensive frames and receivers of a similar type is consistent with manufacturing and straw purchasing and inconsistent with personal use or collecting.

13. Campbell's text messages also indicate that he built firearms for others, which he then sold. For example, on April 22, 2023, Campbell

sent a text message stating: “I csn [sic] clear up any concerns u have with the AR15 pistol. It’s completely legal and currently linked to me. If u have a cpl i can fill out paperwork to transfer it to u or u can just buy it your choice. They are all built by me using quality lifetime warranty parts so if u ever have s [sic] problem u can bring it back and we can use the warranty to remedy.” On December 21, 2022, Campbell sent a text stating: “That one is on sale whole for 750. But of course if I build it then the price is lower.” On January 1, 2023, Campbell sent a text message stating: “I build AR15 and glocks now.”

14. When asked by a repeat customer how much a firearm would cost, Campbell explained his pricing plan: “Basically like last time 50 bucks over what it costs to make. I already had have [sic] the parts for that last one but with something like this I would need to order everything so it probably would come out to like 6 or 650 or cheaper depending on prices.”

15. Campbell’s text messages also indicate that he tried to move his products quickly. For example, an FFL record shows that he purchased a frame for a handgun on November 3, 2022. Campbell’s text messages show that he offered to sell it as a fully functioning pistol by

December. On December 7, 2022, he sent a photograph of a completed firearm with the frame he purchased on November 3, stating: “And I got this one ready to go for 4.”

RECOVERY OF FIREARMS IN CRIMES

16. Eleven of the 93 firearms Campbell is known to have purchased were recovered by law enforcement during criminal investigations from individuals other than Campbell, the majority of which were soon after Campbell had purchased them.

17. According to ATF statistics, the median time-to-crime for firearms purchased in the United States and recovered by law enforcement in the United States is 1,293 days or slightly more than three years. Campbell’s 11 firearms were recovered with a median time-to-crime of 283.5 days, while some were recovered by police in the hands of others as soon as 10, 37, and 41 days after Campbell purchased them.

18. This table summarizes the purchase history and circumstances of the eleven recovered firearms.

| Model | Date Purchased | Date Recovered | Circumstances of Recovery |
|---|-----------------------|------------------------------|---|
| 1. AM-15, multi-caliber lower receiver | 05/19/23 | 04/11/24 (328 days later) | Search warrant in Detroit. Recovered with additional firearms and narcotics. |
| 2. AM-15, multi-caliber lower receiver | 03/14/23 | 02/23/24 (346 days later) | Search warrant for a non-fatal shooting. Firearm found with a loaded drum magazine attached, hidden in attic. |
| 3. AM-15, multi-caliber lower receiver | 10/02/23 | 01/31/24 (121 days) | Firearm turned over to DPD by the brother of a convicted felon. |
| 4. AM-15, multi-caliber lower receiver | 12/24/23 | 01/30/24 (37 days) | Search warrant for residence of convicted felon referenced in firearm #3. Firearm was loaded with a 60-round magazine. |
| 5. 5.7 Rock, 5.7 caliber frame | 07/01/23 | 01/04/24 (187 days) | Search warrant in Minnesota for a drive by shooting. Firearm was recovered during a search of the suspect vehicle. |
| 6. Dagger, 9mm pistol | 11/06/23 | 12/17/23 (41 days) | DPD officers responding to an armed robbery were shot at with shots striking a DPD vehicle. Firearm #6 was recovered along with two other firearms. |

| | | | |
|--|----------|-------------------------|---|
| 7. Dagger Compact, multi-caliber frame | 06/24/23 | 11/21/23 (150 days) | Recovered by DPD from a vehicle, loaded with one live round and a thirty-one-round extended magazine. |
| 8. 5.7, multi-caliber frame | 08/21/23 | 08/31/23 (10 days) | Recovered by DPD from a vehicle, loaded with one live round. |
| 9. PA-15, multi-caliber lower receiver | 09/29/22 | 07/19/23 (293 days) | Recovered during a search of a residence along with several other firearms, ammunition, firearm magazines, and narcotics. |
| 10. PA-15, multi-caliber lower receiver | 03/02/22 | 07/12/23 (497 days) | Recovered during a search of a residence along with additional firearms. |
| 11. Pardner Pump, 12 Gauge shotgun | 02/24/18 | 04/22/21 (1153 days) | Recovered when executing search warrant for narcotics |

19. ATF queried Campbell in the Law Enforcement Information Network (LEIN) and discovered Campbell had registered only one pistol with the state for Michigan after May 2020 despite purchasing at least 88 firearms in this period. Prior to May 2020, however, Campbell had registered 25 pistols.

20. Based on my training, experience, and conversations with other law enforcement officers, individuals who straw purchase or

manufacture firearms often do not register firearms because: (1) it can inhibit law enforcement's ability to back trace the firearm; and (2) the purchaser does not intend to keep the firearm.

CONCLUSION

21. Probable cause exists that Kristin Terez Campbell, violated 18 U.S.C. § 922(a)(6) (False Statement During Purchase of a Firearm) and 18 U.S.C. § 922(a)(1)(A) (Engaging in Manufacturing and Distribution of Firearms Without a License).

Respectfully submitted,



Christopher E. Loperfido
Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my
Presence and/or by reliable electronic means.



Hon. David R. Grand
United States Magistrate Judge

Dated: September 5, 2024